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May 4, 2015

VIA ECF

Honorable Alan S. Trust, U.S.B.J.
United States Bankruptcy Court
Eastern District of New York
290 Federal Plaza
Central Islip, NY 11722

Re: In Re: Medford Development Corp., et al.
Case No. 14-75666 (AST)

Dear Judge Trust:

This office represents Cumberland Farms Inc. and Gulf Oil Limited Partnership (together “Gulf”) in the above-referenced matter. Please allow this letter to serve as a supplemental request for an adjournment of the hearings currently scheduled on May 11, 2015 for Debtors’ Counsel’s Initial Application for Allowance of Compensation (Doc 212, “Fee Application”), Gulf’s motion to convert the jointly administered Chapter 11 cases to cases under Chapter 7 (Doc 37, “Motion to Convert”), and Debtor’s Motion seeking an Order to Show Cause to stay the District Court Action seeking enforcement of personal guarantees against the Debtors’ principal (Adv. Pro 15-08020 Docs 4 and 6, “Order to Show Cause”).

On April 29, 2015, this office requested an adjournment of these hearings by letter, noting that certain issues have emerged that will require further discovery in advance of the hearings, including the plethora of issues surrounding Debtors’ Counsel’s conflicts of interest. Michael Macco, counsel for Debtors, today agreed to a one (1) month adjournment of time to hear the Fee Application so that discovery may proceed, including his deposition. Mr. Macco has also indicated that he will be filing affidavits to break down the Fee Application by Debtor. This adjournment is acceptable to the U.S. Trustee, Christine Black. Bank creditor New York Commercial Bank (“NYCX”) has previously stated that it would agree to any adjournment that Gulf and Debtors’ Counsel agree to.

It is Gulf’s position that this discovery will also provide substantial assistance in resolving the Motion to Convert and Order to Show Cause, as there currently remain unanswered

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questions as to the integrity of the entire Chapter 11 filings and Order to Show Cause. We believe that responses to detailed questions on these issues during discovery are vital to adjudicate these important issues.

Gulf does not seek to adjourn Debtors' Interim Application insofar as it is being held to consider payment for the Broker for the Debtors.

For the reasons set forth above, Gulf respectfully seeks to adjourn these three hearings pending further discovery.

Respectfully submitted,

/s/ Bruce S. Rosen
Bruce S. Rosen

BSR/ckc

cc: Michael Macco, Esq.
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